

# EXHIBIT 2



Daniel McGonagle  
Direct Dial: 617-456-8081  
dmcgonagle@princelobel.com

April 6, 2021

**VIA E-Mail**

Matthias Kamber  
Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111

**Re: Singular Computing LLC v. Google LLC- Civil Action No. 1:19-cv-12551-FDS**

Dear Matthias:

We write regarding Google LLC's deficient document production served in response to Plaintiff's First Set of Requests for Production. Documents that were produced by Google are either unreadable in their current format or reference documents that have not yet been produced.

More particularly, the documents referenced below should be produced in native format. If the document is not available in native form then these documents should be produced in a manner in which all images and text can be read and understood.

- GOOG-SING-00104357
- GOOG-SING-00148944
- GOOG-SING-00000387
- GOOG-SING-00003752
- GOOG-SING-00112291
- GOOG-SING-00026944

Further, several documents that are referenced in your production, have not been produced. The following documents have been omitted from production and are clearly responsive to Plaintiff's First Set of Requests for Production.

- The document available at GOOG-SING-00000387 mentions documents entitled go/datacenter-ml-metrics; go/perf-metric-tpus; and go/perf-tco:nn-accelerators. Further, the document referenced in the hyperlink in this sentence: "The TCO for a platform including system capex and power is computed based on the methodology outlined here."

Prince Lobel Tye LLP  
One International Place  
Suite 3700  
Boston, MA 02110  
TEL: 617 456 8000  
FAX: 617 456 8100

- “The Innovation behind Google’s Data Centers” referenced in GOOG-SING-00002124 at -2170.
- “2013-08-06” and “Compute Systems Infrastructure Review 8/6/13” referenced in GOOG-SING-00070606 at -70611.
- The documents referenced by URL in “Comment [3]” and “Comment [5]” of GOOG-SING-00026944.
- The document available at the hyperlink referenced in this sentence: “See this very detailed analysis for more information, including workloads-specific performance/TCO analysis” available at GOOG-SING-00000221.
- The “Worksheet (restricted)” referenced in GOOG-SING-00004490 at -4537.
- The document referenced as “Quarterly perf/TCO roadmap review for Q1 2017 (restricted access)” in GOOG-SING-00047550 at -47552.
- The document referenced in this sentence: “As part of discussion in a separate document, Dan Hurt, Thomas Olafsson, and I agreed that the operation cost of one 30 Megawatt datacenter building...” available at GOOG-SING-00027474 at -476.

Given the approaching depositions, it is imperative that Google resolve these issues expeditiously. Therefore, Singular asks that Google produce the above-mentioned material on or before April 13<sup>th</sup>.

Should a meet and confer be necessary, Singular is generally available on April 13<sup>th</sup>.

Sincerely,

/s/ Daniel McGonagle